

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134

Bryce K. Kunimoto, Esq.
Nevada Bar No. 7781
Robert J. Cassity
Nevada Bar No. 9779
David J. Freeman
Nevada Bar No. 10045
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Phone: (702) 222-2542
Fax: (702) 669-4650
bkunimoto@hollandhart.com
bcassity@hollandhart.com
dfreeman@hollandhart.com

Attorneys for Defendant Victor Chang

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AUDIO VISUAL SERVICES GROUP, INC.
d/b/a PSAV PRESENTATION SERVICES, a
Delaware Corporation,

Plaintiff,

v.

VICTOR CHANG, an individual,

Defendant.

CASE NO.: 2:15-cv-01449-APG-VCF

**STIPULATION AND PROPOSED
ORDER TO EXTEND TEMPORARY
RESTRAINING ORDER AND
CONTINUE HEARINGS**

(First Request)

Defendant Victor Chang (“Mr. Chang” or “Defendant”) and Plaintiff Audio Visual Services Group, Inc. d/b/a PSAV Presentation Services (“PSAV” or “Plaintiff”), by and through their respective attorneys of record, pursuant to Federal Rule of Civil Procedure 6(b)(1), and Local Rule 6-1, hereby stipulate and agree as follows:

1. Plaintiff commenced this action on July 29, 2015 by filing its *Complaint for Injunctive Relief and Damages* (Dkt #1).

2. Also on July 29, 2015, Plaintiff filed an *Emergency Ex Parte Motion for Temporary Restraining Order, Preliminary Injunction and Supporting Memorandum of Points and Authorities* (Dkt. #5) wherein Plaintiff sought to enjoin Mr. Chang from describing, disclosing, misappropriating, publishing, taking, transmitting, transferring, or using for any

1 purposes certain information Plaintiff contends is confidential and/or proprietary (the
2 “Confidential and Trade Secret Information”).

3 3. On July 30, 2015, the Court entered a *Temporary Restraining Order* (Dkt. #7)
4 (the “TRO”), which required Mr. Chang to, among other things, recall and deliver to Plaintiff all
5 original and copies of any and all correspondence, documents and other material containing,
6 referring or relating to the Confidential and Trade Secret Information, which are in his
7 possession, custody or control, and to refrain from altering, deleting, modifying or removing any
8 data from any and all personal data devices.

9 4. The TRO also required Mr. Chang to file and serve upon Plaintiff’s counsel
10 within ten (10) days after entry of the TRO a written notice, under oath, setting forth in detail the
11 manner in which he has complied with the TRO (the “Written Notice”).

12 5. Further, the TRO set a hearing on Monday, August 10, 2015, at 3:30 p.m. at
13 which time the Court would hear oral argument and decide whether to extend the TRO or grant
14 preliminary injunctive relief (the “Preliminary Hearing”).

15 6. The Summons, Complaint and TRO were served upon Mr. Chang on or about
16 July 30, 2015. Accordingly, the date by which the Written Notice is required to be filed and
17 served is Monday, August 10, 2015.

18 7. On August 6, 2015, the Court entered an *Order* (Dkt #10) setting a status hearing
19 to determine additional briefing on the issue of Plaintiff’s request for permission to enter Mr.
20 Chang’s premises and work location to identify and inspect locations where the information at
21 issue may be stored, which was set for August 14, 2015 at 2:00 p.m. (the “Status Hearing”).

22 8. The parties are currently coordinating the preservation and return of the
23 Confidential and Trade Secret Information without additional Court intervention.

24 9. WHEREFORE, the parties stipulate and agree to extend the deadline for Mr.
25 Chang to file and serve the Written Notice and to continue the Preliminary and Status Hearings
26 as follows:

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134

- a) The parties agree to extend the *Temporary Restraining Order* (Dkt. #7), filed on July 30, 2015, until the continued date of the Preliminary Hearing as set forth below.
- b) The parties agree to extend the deadline for Mr. Chang to file and serve the Written Notice for a period of ten (10) days to August 20, 2015.
- c) The parties agree to continue the Preliminary Hearing for a period of ten (10) days to August 20, 2015, or as soon thereafter as the Court's schedule will allow.
- d) The parties agree to continue the Status Hearing for a period of ten (10) days to August 24, 2015, or as soon thereafter as the Court's schedule will allow.

10. This Stipulation is submitted prior to the expiration of the period originally provided for (1) the filing and service of the Written Notice (August 10, 2015), (2) the Preliminary Hearing (August 10, 2015) and (3) the Status Hearing (August 14, 2015), is not interposed merely for delay, and is made in good faith between the parties hereto. The parties have not made a similar prior request.

IT IS SO STIPULATED:

DATED August 7, 2015.

DATED August 7, 2015.

/s/ David J. Freeman, Esq.

/s/ Dennis D. Leone, Esq.

Bryce K. Kunitomo, Esq.
Robert J. Cassity, Esq.
David J. Freeman, Esq.
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
Attorneys for Defendant Victor Chang

Joseph R. Ganley, Esq.
Patricia Lee, Esq.
HUTCHISON & STEFFEN, LLC
10080 W. Alta Drive, Suite 200
Las Vegas, Nevada 89145

Dennis D. Leone (*Pro hac vice* forthcoming)
Jonathan K. Stitt (*Pro hac vice* forthcoming)
SHANKMAN LEONE, P.A.
707 N. Franklin Street, 5th Floor
Tampa, Florida 33602
Attorneys for Plaintiff PSAV

IT IS SO ORDERED this ____ day of August, 2015:

UNITED STATES DISTRICT JUDGE